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Attorneys for Plaintiff
JOSE HIGAREDA GOMEZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOSE HIGAREDA GOMEZ,

Plaintiff,

v.

CITY OF FREMONT, CRAIG STECKLER,
Individually and In His Capacity As the
Fremont Police Chief; Officer TIMOTHY
BALDOCCHI, Individually and In His
Capacity As A Fremont Police Officer,
Officer TOM SEVERANCE, Individually and
In His Capacity As A Fremont Police Officer,
and Officer MATTHEW SNELSON,
Individually and In His Capacity As A
Fremont Police Officer; DOES 1 THROUGH
20, INCLUSIVE,

Defendants.

CASE NO. C07-00005 LB

**STIPULATION AND [~~PROPOSED~~] ORDER
EXTENDING DISCOVERY SCHEDULE**

Magistrate Judge Laurel Beeler

1 WHEREAS, pursuant to the Court's Order dated March 6, 2010, the close of non-
2 expert discovery in this matter is August 12, 2010; the deadline for all expert disclosures
3 required by the Federal Rules of Civil Procedure is September 9, 2010; and the close of expert
4 discovery is October 7, 2010;

5 WHEREAS, pursuant to the Court's Order dated July 21, 2010, Plaintiff Jose
6 Higareda Gomez was referred to the Federal Pro Bono Project;

7 WHEREAS, Latham & Watkins, LLP was engaged to represent the Plaintiff on
8 August 16, 2010; and

9 WHEREAS the parties have agreed to extend the discovery schedule in this case;

10 IT IS HEREBY STIPULATED by and between the parties hereto through their
11 respective attorneys of record that:

- 12 1. The deadline for the parties to serve discovery requests is extended to
- 13 September 27, 2010;
- 14 2. The close of non-expert discovery is extended to October 11, 2010;
- 15 3. The deadline for the exchange of expert reports and all expert disclosures
- 16 required by the Federal Rules of Civil Procedure is extended to October
- 17 18, 2010;
- 18 4. Discovery motions shall be served by October 20, 2010;
- 19 5. Expert rebuttal reports shall be served by October 27, 2010; and
- 20 6. The close of expert discovery is extended to November 8, 2010.

22 Dated: September 14, 2010

LATHAM & WATKINS LLP

23 By _____ /s/
24 Danielle A. Lackey
25 Attorneys for Plaintiff
Jose Higareda Gomez

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1 Dated: September 14, 2010

BERTRAND, FOX & ELLIOT

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By _____ /s/ _____

Gregory M. Fox
Arlene C. Helfrich
Martine D'Agostino
Attorneys for Defendants CITY OF
FREMONT, FREMONT POLICE CHIEF
CRAIG STECKLER and OFFICERS
TIMOTHY BALDOCCHI AND
MATTHEW SNELSON

*Filer's Attestation: Pursuant to General Order No. 45, Section X(b) regarding signatures,
Danielle A. Lackey hereby attests that concurrence in the filing of this document on behalf of
Bertrand, Fox & Elliot has been obtained from Gregory M. Fox, Esq.*

PURSUANT TO STIPULATION, IT IS SO ORDERED:



Dated: September 15, 2010

Laurel Beeler
UNITED STATES MAGISTRATE JUDGE